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March 18, 2022

VIA ECF
Hon. Steven Tiscione
United States District Court
Eastern District of New York
100 Federal Plaza
Central Islip, New York 11722

Re: *Besedin v. County of Nassau, et al.*
Docket No. 18-CV-0819 (KAM)(ST)
File No. 210099

Your Honor:

I represent the defendants in this action. I write to request an extension of the discovery deadline in this matter, on consent of all parties.

As the Court is aware, Mark Radi, Esq. wrote in January 2022 to advise the Court of the status of discovery and the difficulties the parties encountered in completing plaintiff's deposition. On or about January 13, 2021, the Court extended the parties discovery deadline to April 11, 2022.

Shortly thereafter, Mr. Radi left this firm, and this matter was reassigned to me. Unfortunately, my ability to get up to speed on this file and proceed with discovery was significantly hampered as I was out of the office due to illness and bereavement. Specifically, I and my immediate family contracted COVID-19, resulting in my father-in-law's passing from COVID-19 related pneumonia in February 2022.

Since returning to the office I have spoken with Mr. Brewington, and we are working together in a good faith effort to complete all necessary discovery. Unfortunately, conflicts in our respective trial schedules have made scheduling depositions difficult. A considerable amount of my time this past month has been dedicated to preparing for trial in the matter of *Santaiti v. Town of Ramapo*, scheduled to commence on March 22, 2022 in New York State Supreme Court, Rockland County. Plaintiff's counsel advises me that he is scheduled to be on trial for the first two weeks of April 2022, and will be unable to conduct depositions during that time.

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Under the circumstances, the parties respectfully request that the discovery deadline be extended approximately sixty (60) days. Thank you for your consideration of this matter.

Very truly yours,

SOKOLOFF STERN LLP


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CC:

Via ECF

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